

THE
DOE RUN
COMPANY
SMELTING DIVISION

MAY 22 2003

SUPERFUND DIVISION

amiller@doerun.com

May 16, 2003

Bruce Morrison
USEPA Region VII
901 North 5th
Kansas City, Kansas 66101

40322443



Superfund

Re: Transportation and Materials Handling Plan

Dear Bruce:

Thank you for taking the time to meet with Clif Gray and Dan Vornberg earlier this week to discuss ways to reconcile differences in the haul route portions of the Transportation and Materials Handling Plan. The following will address the concerns listed in your letter of April 29th as modified and agreed to in the meeting of May 14th.

1. Vehicle wash facility location and operation:

Doe Run will leave the vehicle wash facility at its current location. Concentrate truck traffic will be routed along the east side of the strip mill building and entering the vehicle wash facility from the south side. Therefore Doe Run will be able to leave the wash facility at its current location. All lead concentrate trucks will be washed prior to exiting the plant. Product trucks will not be washed unless lead loading (mg/ft²), sampled by EPA, on the East Road midway between the loading dock and the rail road tracks on the exit lane is higher than the lead loading found on non-truck route road(s) in Herculanum. (Non-haul route road lead loading and concentration will be determined by EPA) If the East Road lead loading sample is greater than the lead loading sample of the non-truck route road(s), then Doe Run will wash all trucks, including product trucks, until EPA samples determine that the East Road has been cleaned to lead level equal or less than the non-haul truck road. If queing problems effect operations, or product truckers refuse to agree to be washed in business impacting numbers, Doe Run will suspend washing on product trucks and notify EPA and submit a modification for EPA approval within 2 weeks.

The new road for lead concentrate trucks and routing of lead concentrate trucks to the vehicle wash station will be complete by October 1, 2003.

2. Realign the red and green zones appropriately:

Red and green zones will be aligned to ensure that all areas within the plant, including the concentrate truck unloading area, are designated red. If the EPA sampling on the East Road is greater than the lead loading sample of the non truck route road(s) then Doe Run will classify the East Road as red until such time as EPA samples determine that the East Road has been cleaned to lead level equal to or less than the non haul truck road.

3. Wash all vehicles as they exit the facility

Refer the #1 above.

4. Submit schedules for the following BMP's:

- a. More effective street cleaning methods;

Doe Run has recently purchased a second dry street sweeper. After repairs are completed on the original dry street sweeper, Doe Run will be better able to provide daily sweeper coverage except in the event of inclement weather or the unlikely event that both will be out of service for maintenance at the same time.

- b. Sealing lead concentrate trucks;

Plastic liners, while good for a land fill type application, are not compatible with the materials handling required for lead concentrate at a smelter. Doe Run has banned pup trailers. Tailgates will be sealed with a rigid rubber seal. We will evaluate, with the carrier, a soft rubber seal. If this or other seals and/or sealants are found effective, Doe Run will ask EPA for approval..

- c. Seal stock piles of lead bearing materials with a lime slurry sealant;

Stock piles of lead concentrate, lead bearing secondary materials and by-products will be sealed with a lime slurry sealant or other dust suppressant beginning immediately. Stock piles will be checked on a weekly basis and resealed as necessary.

- d. Minimize multiple handling of lead bearing materials;

Doe Run will construct a new lead concentrate unloading facility which will allow the lead concentrate trucks to unload directly into railcars. We will add sufficient rail cars to significantly reduce our on pad storage of lead concentrate.

Engineering, contractor bids and materials acquisition: 6 months from date of approval of these revisions

Excavation, construction: 12 months from date of approval of these revisions.

- e. Convert strip mill building into a lead bearing material storage area;

While this is a good idea, this building is not available as previously thought. This building is needed for other commercial needs.

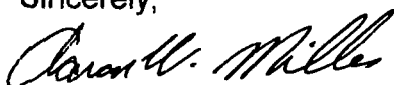
- f. Use super sucker or similar technology on the streets;

Doe Run will begin immediately to use our Ultra Vac or similar technology on the sides of the haul routes from the product dock, along the East Road to Station Street, along Station Street to the corner of Station Street and Brown Street going west and from the corner of Station Street and Main Street to the corner of Main Street and Curved Street going north. This will be done at least once every 6 months beginning in May 2003. A schedule will be included in the final submission.

Please accept this letter as satisfying the May 19th resubmittal of the Herculanum Transportation and Materials Handling Plan. Doe Run will submit the above mentioned changes June 1, 2003 and updated drawings and work procedures by June 30, 2003.

Should you have any questions, please call me at 636/933-3180. Doe Run continues to look toward opportunities to make Herculanum better tomorrow than today.

Sincerely,



Aaron W. Miller
Environmental Manager of Primary Smelting
The Doe Run Company

Cc: Clif Gray, Doe Run
Dan Vornberg, Doe Run
Bob Hinkson, MDNR